

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA**

**MICHAEL ASHFORD**

**CIVIL ACTION NO. 14-992**

**VERSUS**

**JUDGE UNASSIGNED**

**AEROFRAME SERVICES LLC, AND  
AVIATION TECHNICAL SERVICES,  
INC.**

**MAGISTRATE KAY**

**UNOPPOSED AND AGREED MOTION TO SUSPEND BRIEFING DEADLINES AND  
CONTINUE ALL HEARINGS**

NOW INTO COURT, through undersigned counsel, comes Aeroframe Services, L.L.C., who moves this Court, with agreement from opposing counsel opposite, to continue all upcoming hearings, including, but not limited to, the Evidentiary Hearing on ATS Motion for Sanctions (Doc 159) set for October 8, 2020 and suspend all briefing deadlines in this case and all related cases, including, but not limited to, the Deadline to submit Opposition to ATS Memorandum (Doc 299) as follows:

1.

Before this Court for evidentiary Hearing on October 8, 2020, is ATS Motion for Sanctions (Doc. 159).

2.

Currently this Court has set the briefing deadline for Somer Brown, Aeroframe Services, L.L.C., Roger Porter and Tom Filo, to submit their Oppositions to ATS' Memorandum Suggesting Appropriate Sanctions Against the Sanctioned Parties (Doc 299), for September 4, 2020.

3.

Due to the mass destruction of Hurricane Laura in Lake Charles, Louisiana, on Wednesday August 26, 2020, it is anticipated that it will take months before the offices of Terry Thibodeaux, Somer Brown, Tom Filo and David Frohn will be operational. Undersigned counsel has personally

spoken to each attorney, who at this time, do not even know the full consequence of the destruction of Hurricane Laura, where they reside and operate their offices. Further, undersigned has been authorized by, and requested to do so, by, the above listed attorneys representing all of the parties adverse to ATS.

4.

Counsel for ATS did not object to continuing hearings or the reset of deadlines.

5.

Undersigned counsel prays that all deadlines, including the briefing deadline of September 4, 2020 to ATS Memo (Doc 299) be suspended, and that the upcoming Evidentiary Hearing currently set for October 8, 2020 be continued to a status conference date for the parties to select new deadlines. So that the Court understands, there were depositions of counsel for ATS, that were upset due to Hurricane Laura, that are necessary to go forward.

Respectfully submitted,

*s/ Lawrence C. Billeaud*

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**COUNSEL FOR AEROFRAME  
SERVICES, L.L.C.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing motion was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record via the Court's CM/ECF system, this 28th day of August, 2020.

*s/ Lawrence C. Billeaud*